PUC Order on Disconnections Expires

June 22, 2020

As previously reported, the PUC issued an order in March putting a stop to water utility disconnections for customers of investor-owned utilities, which TRWA advised its WSC, district, and city members to voluntarily follow as a best practice. The PUC initially intended the order to coincide with the governor's statewide disaster declaration, but the commissioners recently changed course by letting the order lapse last week. This means that utilities may resume disconnections for nonpayment of water bills. However, TRWA recommends that utilities implement a transition policy for resuming disconnections rather than an abrupt return to business as usual. Here are some tips for reinstituting service disconnections for nonpayment:

- Give your customers advance notice of the date on which you will resume disconnecting service for nonpayment. We recommend a date around July 15, though the specific date may vary depending on your system's billing cycle.

- Clearly communicate with your customers that they should contact you before your new disconnection date if they are unable to pay their bill, and let them know that you are willing to work out a payment plan with them. This can be done on a water bill, in a separate mailing, or as an announcement on your utility's website or social media.

- Continue to negotiate payment plans with each customer based on their ability to pay and their specific circumstances rather than adopting a one-size-fits-all payment plan.

- If you have customers who have not paid their bills or established a payment plan while the PUC's order was in effect, reach out to them personally to let them know that the PUC's order has expired and you will begin reinstituting disconnections on a specific date if they do not make arrangements for a payment plan.

- Document attempts to reach out to nonpaying customers so you can support the disconnection should they file a complaint with the PUC.

Once your disconnection date passes, you may fully resume your usual disconnection policy as specified in your tariff unless the PUC implements new restrictions in the future in response to COVID-19. TRWA will notify its members immediately if that happens.

Questions? Please contact legal@trwa.org!